

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

Vs.

Jonathan Darus Collier
Vincent Bernard Bridgeforth Jr.

CRIMINAL COMPLAINT

Case Number: C-20-1312M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about June 27, 2020 in Brooks County, in the

Southern District of Texas, defendant,

Jonathan Darus Collier
Vincent Bernard Bridgeforth Jr.

each aiding, abetting and assisting one another, did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the
following facts:

See Attached Affidavit of U.S. Border Patrol Agent **Adam S. Nichols**

Continued on the attached sheet and made a part of this complaint:

Yes No



Signature of Complainant
Adam S. Nichols

Printed Name of Complainant

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

June 28, 2020

Date

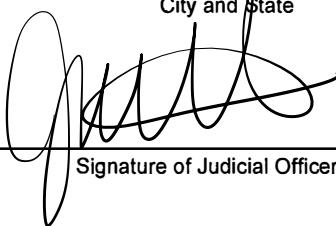
Julie K. Hampton U.S. Magistrate Judge

Name and Title of Judicial Officer

at

Corpus Christi, Texas

City and State



Signature of Judicial Officer

AFFIDAVIT

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

FACTS/DETAILS:

On June 27, 2020, at approximately 4:00 p.m., a Border Patrol Agent reported to the primary agent at the checkpoint that he observed a vehicle near FM 755 that had stopped and appeared to put something in the trunk of the vehicle. The agent informed the primary agent that the vehicle he observed was the black Mazda 3 behind him waiting for inspection.

At approximately 4:10 p.m., a black Mazda 3 sedan approached the primary inspection lane of the United States Border Patrol Immigration Checkpoint near Falfurrias, Texas. The primary agent greeted the driver, later identified as Jonathan Darus COLLIER. The primary agent asked COLLIER where he was going and COLLIER replied, "Houston." The primary agent inquired about where he was coming from and COLLIER replied, "South Padre Island." This response raised the agent's suspicion due to Highway 281 being an uncommon route to take from South Padre Island to Houston. The primary agent asked COLLIER for consent to look into the trunk of the vehicle and COLLIER consented. The primary agent opened the trunk and observed an individual attempting to conceal himself in the trunk. The primary agent requested assistance from other agents at the checkpoint. COLLIER was removed from the vehicle and placed under arrest. The front seat passenger, later identified as Vincent Bernard BRIDGEFORTH Jr., was removed from the vehicle and placed under arrest. COLLIER and BRIDGEFORTH were escorted into the checkpoint.

The individual in the trunk of the vehicle was removed and questioned. The individual, later identified as Nicacio OLVERA-Mejia, admitted to being a national of Mexico illegally present in the United States. OLVERA was placed under arrest and escorted into the checkpoint.

During inventory of the vehicle three handguns were discovered in the vehicle. One handgun, a 9mm Taurus THC9, was discovered on the passenger floorboard with a full magazine and one round in the chamber. Two handguns were discovered in the center console, a .22 Phoenix Arms HP22 and .380 Ruger LCP. The HP22 had a full magazine and the Ruger LCP had one round in the chamber and a full magazine.

During the inventory of the vehicle narcotics were discovered in the glove compartment. The narcotics were weighed and tested. The narcotics were discovered to be three grams of Marijuana and one gram of Cocaine.

MIRANDA RIGHTS WARNING:

All subjects were read their rights in their preferred language and signed accordingly that they understood their rights. COLLIER and OLVERA were willing to make statements without an attorney present. BRIDGEFORTH declined to make a statement without an attorney present.

PRINCIPAL STATEMENT (Jonathan Darus COLLIER):

COLLIER stated he was contacted by a female he met at South Padre Island the week prior in order to do a job. COLLIER stated he and BRIDGEFORTH left Houston and drove to McAllen to meet the female at a Valero gas station. COLLIER stated the female had the alien with her. COLLIER stated the alien got into the backseat of his vehicle. COLLIER stated he was to give the female a call when they passed the checkpoint. COLLIER stated shortly before the checkpoint they pulled over and the alien climbed into the trunk. COLLIER stated he was to be paid \$1000 if they made it to Houston.

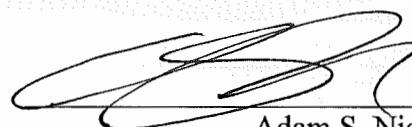
MATERIAL WITNESS STATEMENT (Nicacio OLVERA-Mejia):

OLVERA stated he crossed the Rio Grande River on June 25, 2020. OLVERA stated he was taken to a house where he stayed until June 27. OLVERA stated the caretaker of the house drove him to a gas station where he met the two dark skinned males. OLVERA stated the passenger took his cellphone and told him to get into the trunk. OLVERA stated they did not stop until reaching the checkpoint. OLVERA described the driver as having gold fillings in his teeth.

OLVERA was shown a photo lineup consisting of six photos and was able to positively identify the photo of BRIDGEFORTH as the passenger of the vehicle.

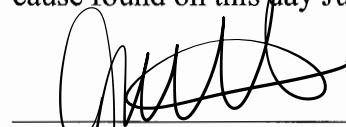
DISPOSITION:

The facts of this case were presented to the Assistant United States Attorney Office who accepted Jonathan Darus COLLIER and Vincent Bernard BRIDGEFORTH Jr. for prosecution of 8 USC 1324, Alien Smuggling. Nicacio OLVERA-Mejia will be held as a material witness.



Adam S. Nichols
Border Patrol Agent

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on this day June 28, 2020.



Julie K. Hampton
United States Magistrate Judge